

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ST. PAUL MERCURY INSURANCE
COMPANY

Plaintiff,

v.

PHILADELPHIA HOUSING
AUTHORITY

Defendant.

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Civil Action No. 02-CV-3511

MOTION TO COMPEL

Plaintiff St. Paul Mercury Insurance Company ("St. Paul"), by its undersigned attorneys, hereby moves to compel the production by PHA of electronic mail messages relevant to the facts and circumstances of this case. The grounds for this motion, which are set forth in full in the memorandum in support hereof, are that the e-mails have been requested by St. Paul in its document request and are plainly within the scope of discovery in this case, but PHA has failed to provide them in discovery.

Respectfully submitted,

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By: 

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DEVLIN & DEVINE

Dated: 7/31/03

By: William J. Devlin, Jr.
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 31st day of July, 2003, **Plaintiff St. Paul Mercury Insurance Company's Motion to Compel** was telecopied and mailed via first-class mail, postage prepaid, to:

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Daniel E. Rhynhart, Esquire
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